



City of Santa Fe Springs

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May 31, 2006

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BY: _____

Bobbie Garcia
California Integrated Waste Management Board
Permitting and Enforcement Division
P.O. Box 4025-MS-16
Sacramento, CA 95812-4025

Dear Ms. Garcia:

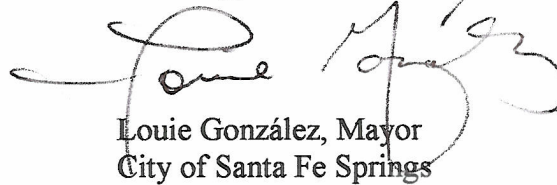
PERMIT IMPLEMENTATION REGULATIONS (ASSEMBLY BILL 1497)

The City of Santa Fe Springs adamantly opposes the proposed Permit Implementation Regulations. While we support the legislative intent of Assembly Bill 1497 (Montanez, 2003) of ensuring residents living near a solid waste facility are afforded proper notification regarding any significant changes to the facility's design and/or operation, we cannot support the proposed Regulations as currently drafted. We believe that the proposed Regulations do not address the importance of the California Integrated Waste Management Board's fiduciary responsibility to verify the facility's consistency with the host jurisdiction's land use permit prior to issuing a Solid Waste Facility Permit (SWFP) or a revision there to.

Without this direct verification (or indirectly by having the facility owner/operator to submit a letter from the host jurisdiction verifying that the proposed activity is consistent with the land use permit), we believe solid waste facilities will be issued a SWFP that may be inconsistent with criteria established for the design and operation of the facility by the host jurisdiction. This would create public confusion and a legal dilemma as to which permit governs. Ultimately, the proposed Regulations will weaken the host jurisdiction's land use authority.

Since land use authority is one of local government's most important tools to protect the public health, safety, and welfare of its residents, we therefore urge the CIWMB not move forward in promulgating the proposed Regulations until it addresses this issue. We thank you for your consideration on this matter. If you have any questions, please contact Paul Ashworth, Assistant to the Director of Planning and Development at (562) 868-0511, Ext. 7353.

Sincerely,



Louie González, Mayor
City of Santa Fe Springs

Cc: Governor Arnold Schwarzenegger
Assembly Member Cindy Montanez
Undersecretary of Cal-EPA (Dan Skopec)
Each Member of the California Integrated Waste Management Board
Los Angeles County Integrated Waste Management Task Force